

March 26, 2015

DIRECT DIAL 216.696.5657 | martin.lewis@tuckerellis.com

VIA FEDERAL EXPRESS

PHONE NUMBER: 312.886.4904

Leslie Patterson
Remedial Projects Manager
U.S. Environmental Protection Agency
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Special Notice Letter and Request for Information for the South Dayton Dump and Landfill Site, Moraine, Ohio

Dear Ms. Patterson:

I am writing on behalf of my client, Valley Asphalt Corporation, regarding the above letter from U.S. EPA dated January 16, 2015. Valley Asphalt is also responding in a separate correspondence to Margaret Herring regarding the Information Request. Based on its knowledge and investigation in this matter, Valley Asphalt is not a potentially responsible party at the South Dayton Dump and Landfill ("Site") pursuant to CERCLA, 42 U.S.C. §9607(a). Therefore, Valley Asphalt declines to reimburse U.S. EPA for past costs at this Site as demanded in the letter of January 16, 2015 and declines to conduct or finance a Remedial Investigation/Feasibility Study (RI/FS) at the Site.


However, as U.S. EPA is aware, Valley Asphalt, as an adjacent landowner, has cooperated with U.S. EPA on issues related to the Site, particularly as it impacts Valley Asphalt's property and operations. Valley Asphalt will continue this cooperation as necessary in a reasonable and appropriate manner.

By way of background, in 2000 while conducting excavation for a new sanitary sewer line under contract with the local governmental authority, Valley Asphalt encountered on its property drums, presumably from the Site. With the knowledge and consent of the local Health Department, Fire Department, and Ohio EPA, Valley Asphalt hired a certified contractor and properly removed and disposed of the drums at its own expense. Furthermore, since 2012, Valley Asphalt has expended substantial time, money and resources complying with U.S. EPA directives to address vapor intrusion onto its property from the Site.

Valley Asphalt will continue to cooperate with U.S. EPA to address issues related to the site as it involves or impacts Valley Asphalt's property and operations. However, it declines to offer to reimburse U.S. EPA for past costs and participate in a RI/FS for the Site.

Very truly yours,

TUCKER ELLIS LLP



Martin H. Lewis

MHL:vag

cc: Jim Jurgensen, II
Dan Crago
Margaret Herring
Thomas Nash

012376\000001\2271676.1

March 26, 2015

DIRECT DIAL 216.696.5657 | martin.lewis@tuckerellis.com

VIA FEDERAL EXPRESS

PHONE NUMBER: 312.886.6239

Margaret Herring, Civil Investigator
U.S. Environmental Protection Agency, Region 5
Superfund Division
Enforcement and Compliance Assurance Branch (SE-5J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Special Notice Letter and Request for Information for the South Dayton Dump and Landfill Site, Moraine, Ohio

Dear Ms. Herring:

I am responding on behalf of my client, Valley Asphalt Corporation, to the Information Request contained in the above-referenced correspondence from U.S. EPA dated January 16, 2015. Valley Asphalt has also responded today to the Special Notice Letter in separate correspondence directed to Ms. Leslie Patterson of U.S. EPA. This correspondence incorporates by reference the correspondence to Ms. Patterson.

Valley Asphalt's response to the Information Request pursuant to Section 104(e)2 of CERCLA, 42 U.S.C. §9604(e)(2) is attached. This response will not repeat each question contained in Enclosure #6 to the above-referenced letter but will respond numerically to each question contained in that enclosure.

In responding to the Information Request, Valley Asphalt is not waiving any defenses to liability under CERCLA and specifically denies that it is a potentially responsible party at the South Dayton Dump and Landfill ("Site") pursuant to CERCLA, 42 U.S.C. §9607(a). The attached response to the Information Request is subject to the following general objections and limitations.

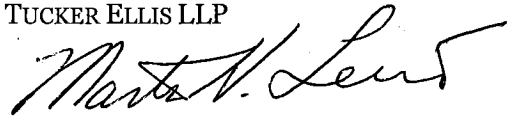
1. The responses are limited in time frame and geographic scope consistent with the email of Thomas Nash of February 12, 2015.
2. Although the attached responses include a certification, Valley Asphalt objects to U.S. EPA requiring, without statutory authority, a certification.
3. Valley Asphalt objects to the Requests to the extent they seek any information or documents that are proprietary or confidential or are protected by any statutory or common law privilege including, but not limited to, the attorney-client privilege.
4. Valley Asphalt objects to the Requests to the extent they seek information or documents that are already in the possession of U.S. EPA or otherwise in the public domain.

5. Valley Asphalt objects to the Requests to the extent that they exceed U.S. EPA's statutory authority or are otherwise overly broad, unduly burdensome, vague or ambiguous and are not relevant to the Site.

Subject to these limitations and objections, Valley Asphalt's responses to the Request for Information are attached.

Very truly yours,

TUCKER ELLIS LLP



Martin H. Lewis

MHL:vag
Enclosures

cc: Jim Jurgensen, II
Dan Crago
Leslie Patterson
Thomas Nash

Response to Request for Information

1. Respondents to questionnaire:
Daniel T. Crago, P.E.
Environmental & Quality Control Manager
Valley Asphalt Corporation
11641 Mosteller Road
Cincinnati, Oh 45241
2. U.S. EPA RCRA permits were reviewed to determine waste activities conducted by Valley Asphalt Corporation (Enclosed permit #OHD004245213). Valley Asphalt Corporation was not able to determine any additional written or verbal documents showing disposal of waste material into the South Dayton Dump & Landfill site in Moraine, Ohio.
3. After extensive inquiries to all known persons potentially able to provide a more detailed or complete response, we determined that all of the information is included herein. No additional persons are known.
4. Valley Asphalt Corporation is not aware of persons including current and past employees with additional information or knowledge about respondent's operations and hazardous substances handling, storage and disposal.
5. Valley Asphalt Corporation never brought or moved drums and/or hazardous substances into the South Dayton and Dump and Landfill Site (SDDL).
6. Valley Asphalt Corporation did not haul or send materials to the South Dayton Dump & Landfill site.
7. Valley Asphalt Corporation has a U.S. EPA RCRA identification number for "Notification of Hazardous Waste Activity (#OHD004245213). This request was made on February 2, 1986 to allow for the use of recycled oil as a fuel source.
8. Valley Asphalt Corporation received recycled oil from Clean Water Ltd (previously Perma-Fix and Clark Oil Products, Inc.) of Dayton Ohio to be used as a fuel source.
9. Valley Asphalt Corporation did not transport hazardous waste.
10. Valley Asphalt Corporation has a U.S. EPA RCRA identification number for "Notification of Hazardous Waste Activity (#OHD004245213). This request was made on February 2, 1986 to allow for the use of recycled oil as a fuel source.

11. Valley Asphalt Corporation has a U.S. EPA RCRA Identification number for "Notification of Hazardous Waste Activity (#OHD004245213). This request was made on February 2, 1986 to allow for the use of recycled oil as a fuel source.
12. Valley Asphalt Corporation filed a Notification of Hazardous Waste Activity on February 2, 1986. The U.S. EPA RCRA Identification number is #OHD004245213. A quantity of material was not specified in the notice.
13. Daniel T. Crago -- Environmental & Quality Control Manager has the current responsibility for all environmental concerns for Valley Asphalt Corporation. Mr. Crago has held this position since April of 1993. The previous Environmental Manager for Valley Asphalt Corporation, Mr. Mel Levy, P.E. is deceased.
14. A Rumpke dumpster with cover is utilized for office waste. A dark brown steel tank in concrete secondary containment is used to collect oil for recycling by Clean Water Ltd. of Dayton (formerly Perma-Fix and Clark Oil Products, Inc.). Recycled asphalt pavement is stockpiled on site to be utilized into new hot mix asphalt for various local paving projects.
15. The U.S. EPA RCRA original filing is included. The contract with Rumpke and Clean Waters is an open contract with pick-up as needed.
16. g: Rumpke delivers to Montgomery County Solid Waste District 2550 Sandridge Drive Moraine, Oh 45439. Clean Water Ltd. (formerly Perma-Fix and Clark Oil Products, Inc.) delivers to 300 Cherokee Drive Dayton, Oh 45417. Valley Asphalt Corporation recycles asphalt pavement at 1901 Dryden Road, Dayton Ohio 45439.

h: Rumpke, Clean Water Ltd.(formerly Perma-Fix and Clark Oil Products, Inc.).

i: Valley Asphalt Corporation does not transport waste.

j: Office waste-Rumpke, recycled oil-Clean Water Ltd. (formerly Perma-Fix and Clark Oil Products, Inc.).

k: Office waste-Rumpke picked up weekly, recycled oil was picked up by Clean Water Ltd.(formerly Perma-Fix and Clark Oil Products, Inc.) as needed.

l: Office waste: approximately 4 cubic yards weekly. Recycled oil : approximately 500 gallons per month during the construction season (April through October).

m: Clean Waters Ltd. (formerly Perma-Fix and Clark Oil Products, Inc.) had the contract for recycled oil removal from 1986 to present. I do not have the Rumpke start date, but they currently haul the office waste today.

n: The waste carrier decided the location where each of the Respondent's wastes were taken.

o: Clean Waters Ltd. (formerly Perma-Fix and Clark Oil Products, Inc.) uses a tanker truck to pick up the recycled oil. Rumpke uses a garbage truck to pick up the office waste.

j: Valley Asphalt Corporation does not have information on Waste Carrier's employees who collected our recycled products.

k: Rumpke delivers to Montgomery County Solid Waste District 2550 Sandridge Drive Moraine, Oh 45439. Clean Water Ltd. (formerly Perma-Fix and Clark Oil Products, Inc.) delivers to 300 Cherokee Drive Dayton, Oh 45417. Valley Asphalt Corporation recycles asphalt pavement at 1901 Dryden Road, Dayton Ohio 45439.

l: Valley Asphalt does not have documents indicating the ultimate disposal/recycling/treatment location for each type of recycled material.

m.i: The recycled products were picked up on site as needed so inventory was not needed.

m.ii: The office waste was picked up on a weekly schedule by Rumpke and the recycled oil was picked up as needed by Clean Waters Ltd. (formerly Perma-Fix and Clark Oil Products, Inc.).

m.iii: Valley Asphalt Corporation contacted the main offices for recycled oil removal: Clean Water Ltd. (formerly Perma-Fix and Clark Oil Products, Inc.). 300 Cherokee Drive Dayton, Oh 45417, and Rumpke 3800 Struble Road Cincinnati, Oh 45251.

m.iv: The pay rate has changed over a 30 year span of pick-up services.

m.v: All billing was handled by the accounts payable for Valley Asphalt Corporation.

m.vi: Valley Asphalt Corporation made payment to the main offices for recycled product removal: Clean Water Ltd. 300 Cherokee Drive Dayton, Oh 45417, and Rumpke 3800 Struble Road Cincinnati, Oh 45251.

n: Valley Asphalt Corporation did not decide the location where each of the Respondent's recycled products were taken.

o: Valley Asphalt Corporation utilized qualified companies for recycled product removal and let them decide on the proper disposal steps.

p.i: The only waste is sewage from the office.

p.ii: The waste is disposed on the dates the offices are in use.

p.iii: Office #1 had six (6) personnel working full time until it was shut down and Office #4 has four (4) personnel working full time during the construction season (March – December).

p.iv: The sanitary waste from building #1 and building #4 drains to an on-site storage tank that is located behind building #1 (Building #1 from attachment #1 Report from the U.S. EPA from the Summary of Results from 2012 Vapor Intrusion Study – October 23, 2012). The storage tank is serviced by Rumpke. The sanitary waste from building #2 enters a sanitary line that is owned by the Montgomery County Sanitary Department.

p.v: Pretreatment was not provided.

q: The sanitary waste from building #2 enters a sanitary line that is owned by the Montgomery County Sanitary Department.

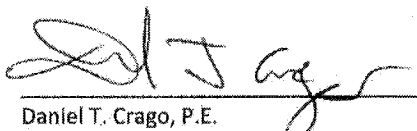
r: Valley Asphalt Corporation did not send waste to the South Dayton Dump and Landfill Site.

17. The U.S. EPA RCRA Identification number is #OHD004245213. The Ohio EPA Air Emission Permit Number is #08-57-10-1899 P001.
18. The Notification of Hazardous Waste Activities was filed with the United States Environmental Protection Agency Region 5 230 South Dearborn Street Chicago, Illinois 60604. The Permit to Install to burn recycled oil was issued on April 12, 1989 by the Regional Air Pollution Control Agency 451 West Third Street P.O. Box 972 Dayton, Oh 45422.
19. The Notification of Hazardous Waste Activities was filed on February 21, 1986 with the United States Environmental Protection Agency Region 5 230 South Dearborn Street Chicago, Illinois 60604. The Permit to Install to burn recycled oil was issued on April 12, 1989 by the Regional Air Pollution Control Agency 451 West Third Street P.O. Box 972 Dayton, Oh 45422.
20. The Permit to Install to burn recycled oil was issued by the Regional Air Pollution Control Agency 451 West Third Street P.O. Box 972 Dayton, Oh 45422.
21. The Permit to Install to burn recycled oil was issued on April 12, 1989 by the Regional Air Pollution Control Agency 451 West Third Street P.O. Box 972 Dayton, Oh 45422.
22. Valley Asphalt Corporation has reported the recycling of used oil in accordance with Ohio Administrative Code Rule #3745-31-05(A)(2) and Ohio Administrative Code Rule #3745-31-01(F) and defined by the Ohio Permit to Install # 08-1546 dated April 12, 1989. Valley Asphalt

Corporation filed the Tier 2 State Emergency Response Reports on March 1, 2007 with the Ohio Environmental Protection Agency/RTK 50 West Town Street (Suite 700) Columbus, Oh 43216. The Notification of Hazardous Waste Activities as required by the "Waste-As-Fuel" regulations promulgated on November 29, 1985 on 49 CFR Part 266, Subparts D and E and Resource Conservation Recovery Act (RCRA) Section 3010 was filed on February 21, 1986 with the United States Environmental Protection Agency Region 5 230 South Dearborn Street Chicago, Illinois 60604.

23. Valley Asphalt Corporation has reported the recycling of used oil in accordance with Ohio Administrative Code Rule #3745-31-05(A)(2) and Ohio Administrative Code Rule #3745-31-01(F) and defined by the Ohio Permit to Install # 08-1546 dated April 12, 1989. Valley Asphalt Corporation filed the Tier 2 State Emergency Response Reports on March 1, 2007 with the Ohio Environmental Protection Agency/RTK 50 West Town Street (Suite 700) Columbus, Oh 43216. The Notification of Hazardous Waste Activities as required by the "Waste-As-Fuel" regulations promulgated on November 29, 1985 on 49 CFR Part 266, Subparts D and E and Resource Conservation Recovery Act (RCRA) Section 3010 was filed on February 21, 1986 with the United States Environmental Protection Agency Region 5 230 South Dearborn Street Chicago, Illinois 60604.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.


Daniel T. Crago, P.E.
Environmental & Quality Control Manager

3/24/15
Date

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

Installation's EPA ID Number

Approved

Date Received
(yr. mo. day)

T/A C
1

I Name of Installation

VALLEY ASPHALT CORP PLANT 4

II Installation Mailing Address

Street or P.O. Box

1901 DRYDEN ROAD

City or Town

State

ZIP Code

DAYTON

OH 45439

III Location of Installation

Street or Route Number

1901 DRYDEN ROAD

City or Town

State

ZIP Code

DAYTON

OH 45439

IV Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

LEVY MELVIN L PE

513 293 4119

V Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

VALLEY ASPHALT CORP

P

VI Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

- ☐ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.
☐ 2. Transporter
☐ 3. Releaser/Storer/Disposer
☐ 4. Underground Injection
☒ 5. Market or Burn Hazardous Waste Fuel
(enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☒ c. Burner

B. Used Oil Fuel Activities

- ☒ 6. Off-Specification Used Oil Fuel
(enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☒ c. Burner
☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)
Who First Claims the Oil Meets the Specification

VII Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices)

☐ A. Utility Boiler

☐ B. Industrial Boiler

☒ C. Industrial Furnace

VIII Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

IX First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☒ A. First Notification

☐ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

ID -- For Official Use Only										
C									T/A	C
W										1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 -- 261.24)

☐ 1. Ignitable
(D001)

☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature <i>Melvin L. Levy</i>	Name and Official Title (type or print) Melvin L. Levy P.E.	Date Signed 2.21.86
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Valley Asphalt



MANUFACTURERS VACO BLACKTOP

P. O. BOX 41350 • 11641 MOSTELLER ROAD
Cincinnati, Ohio 45241 • Phone 771-0820

PLEASE REPLY TO

1901 DRYDEN ROAD
DAYTON, OHIO 45439
PHONE (513) 293-4118

February 21, 1986

Facility: Valley Asphalt Corporation Plant 4

Owner of Property: Grillo & Boesch
2011 Dryden Road
Dayton, Ohio 45439



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CINCINNATI, OHIO 45268

October 23, 2012

James Jurgensen - Owner
Valley Asphalt Corporation
1901 Dryden Road
Moraine, Ohio 45439

Dan Crago
Valley Asphalt Corporation
1901 Dryden Road
Moraine, Ohio 45439

1- old office
2 - Quonset Hut
3 -
4 - Control Bld.
5 - office / Lab - Harner
6 - Old by Englewood
mp - Murphy's Plumbing

Dear Messrs. Jurgensen and Crago:

Re: Summary of Results from 2012 Vapor Intrusion Study
South Dayton Dump and Landfill Site - Valley Asphalt (Buildings 1, 2, 4, 5, 6 &
MP)

The United States Environmental Protection Agency (U.S. EPA) prepared this letter to inform you of the results of the sub-slab (space under your building floor) and indoor air samples collected from your property in 2012. Samples were collected in 2012 as part of the vapor intrusion (VI) investigation at the South Dayton Dump and Landfill (SDDL) Site. Conestoga-Rovers & Associates (CRA) collected these samples to determine if solvent- or petroleum-related compounds (see Table 1) are present in soil vapor beneath the foundations and in the indoor air of your property at concentrations which exceed sub-slab and/or indoor air VI screening levels, as established by the Ohio Department of Health (ODH).

VI is the migration of volatile chemicals from the subsurface into overlying buildings. VI is a potential concern at any building, existing or planned, located near soil, groundwater, or soil vapor containing solvent- or petroleum-related compounds that may volatilize or chemicals that are combustible.

The samples were collected by CRA and submitted to TestAmerica Inc. CRA received and validated the results of the laboratory analysis and submitted those results to the U.S. EPA.

The ODH has recommended the screening levels for sub-slab and indoor air samples. The screening levels represent concentrations of a substance that are unlikely to cause harmful (adverse) health effects in exposed people. Detections in indoor air below these levels are not of a health concern. A summary of the analytical results and comparisons to the ODH screening levels can be found in Table 1.

Compounds detected at concentrations greater than the ODH screening levels from sub-slab and indoor air samples are presented below. All of the air samples are measured in units called parts per billion by volume (ppbv). A map identifying each sample location within your building(s) can be found in **Attachment A**.

TABLE 1
SUMMARY OF 2012 SAMPLING RESULTS
FOR
VALLEY ASPHALT CORPORATION

	Building / Probe	Sampling Date	Sample Type	Parameter	ODH Screening Level (ppbv)	Detected Concentration (ppbv)
old office	Building 1 / Probe A	1-10-12	Sub-slab	TCE	20	610
	Building 1 / Probe A	3-13-12	Sub-slab	TCE	20	350
	Building 1 / Probe A	8-6-12	Sub-slab	TCE	20	2,700
	Building 1 / Probe A	8-6-12	Indoor Air	TCE	2	8.1
Queen's Hotel	Building 2 / Probe A	1-10-12	Sub-slab	Methane (Field)	0.5%	6.6 / 7.6%
	Building 2 / Probe A	3-13-12	Sub-slab	Benzene Vinyl chloride Methane (Lab) Methane (Field)	20 20 0.5% 0.5%	98 24 J 6.6 / 6.2% 8.8 / 8.8%
	Building 2 / Probe B	1-10-12	Sub-slab	TCE	20	22
	Building 2 / Probe B	3-13-12	Sub-slab	TCE	20	32
	Building 2 / Probe B	3-13-12	Sub-slab	TCE	20	32
Central Bld.	Building 4 / Probe A	1-10-12	Sub-slab	TCE	20	48 / 46
	Building 4 / Probe A	3-13-12	Sub-slab	TCE	20	63 / 51
	Building 4 / Probe A	8-6-12	Sub-slab	TCE	20	170
	Building 4 / Probe A	9-13-12	Sub-slab	TCE	20	200
	Building 4 / Basement	9-13-12	Indoor Air	Acetaldehyde ^[A]	11	37 J
	Building 4 / 1 st Floor	9-13-12	Indoor Air	Acetaldehyde ^[A]	11	21 J
office / lab	Building 5 / Probe A	1-10-12	Sub-slab	TCE	20	240
	Building 5 / Probe A	3-13-12	Sub-slab	TCE	20	360
	Building 5 / Probe A	8-6-12	Sub-slab	TCE	20	700

Murphy's Plumbing

Building MP	8-6-12	Crawl-space (Indoor Air)	PCE	25	38
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Notes:

48 / 46 – Result / Duplicate Result

J – Estimated Quantity

PCE – Tetrachloroethene

TCE – Trichloroethene

[^] – This compound was not detected in the adjacent sub-slab soil vapor sample, indicating that the indoor air concentration is not due to vapor intrusion

What do these results mean?

Building 1

On August 6, 2012, the chemical trichloroethene (TCE) was observed in a sub-slab sample collected in Building 1 at a concentration of 2,700 ppbv. This result exceeds the ODH TCE sub-slab screening level of 20 ppbv. The chemical TCE was also observed in an indoor air sample at a concentration of 8.1 ppbv. This result exceeds the ODH TCE indoor air screening level of 2 ppbv. These results confirm that vapor intrusion is occurring in Building 1.

Based on the TCE laboratory results of the sub-slab and indoor air samples collected from Building 1, the U.S. EPA and ODH conclude that there is a potential public health threat posed by TCE vapor intrusion. U.S. EPA will be contacting you in the near future to discuss mitigation options for your property as part of the SDDL Site removal action.

Building 2

On March 13, 2012, 6.6% methane was observed in a sub-slab sample collected from Building 2. This result exceeds the ODH methane screening level of 0.5%.

Based on the methane result of the sub-slab collected from Building 2, the U.S. EPA and ODH conclude that there is a potential explosion hazard beneath your property because methane is explosive between 5 and 15%. U.S. EPA will be contacting you in the near future to discuss mitigation options for your property as part of the SDDL Site removal action.

Building 4

In 2012, the chemical TCE was observed in 4 different sub-slab samples collected in Building 4. TCE concentrations ranged from 46 to 200 ppbv, which all four exceed the ODH TCE sub-slab screening level of 20 ppbv. The chemical TCE was not observed in the indoor air samples collected in Building 4 at concentrations greater than the ODH TCE indoor air screening level of 2 ppbv. These results show that at the time of each sampling event in 2012, vapor intrusion has not been documented in Building 4, but that there is the potential for vapor intrusion to occur in the future.

Although the compound acetaldehyde was detected in two indoor air samples at concentrations greater than the acetaldehyde ODH indoor air screening level, this compound was not detected in the co-located sub-slab soil vapor samples, indicating that the indoor air concentrations are not due to vapor intrusion.

Building 5

In 2012, the chemical TCE was observed in 3 different sub-slab samples collected in Building 5. TCE concentrations ranged from 240 to 700 ppbv, which all three exceed the ODH TCE sub-slab screening level of 20 ppbv. The chemical TCE was not observed in the indoor air samples collected in Building 5 at concentrations greater than the ODH TCE indoor air screening level of 2 ppbv. These results show that at the time of each sampling event in 2012, vapor intrusion has not been documented in Building 5, but that there is the potential for vapor intrusion to occur in the future.

Building 6

In January and April 2012, CRA conducted field screening for methane in Building 6. At each sampling event, CRA did not observe any methane detections beneath the sub-slab. Based on the field screening results collected from Building 6, the U.S. EPA and ODH conclude that no additional sampling is required, at this time.

Building MP

On August 6, 2012, the chemical tetrachloroethene (PCE) was observed in an indoor air sample collected from the crawl space in Building MP at a concentration of 38 ppbv. This result exceeds the ODH PCE indoor air screening level of 25 ppbv. This result confirms that vapor intrusion is occurring in Building MP.

Based on the PCE laboratory results of the indoor air (crawl space) sample collected from Building MP, the U.S. EPA and ODH conclude that there is a potential public health threat posed by PCE vapor intrusion. U.S. EPA will be contacting you in the near future to discuss mitigation options for your property as part of the SDDL Site removal action.

The U.S. EPA and ODH would like to take this opportunity to thank you for participating in this important investigation.

If you have health-related questions, please contact Dr. Bob Frey at the ODH at 614-466-1069. If you have questions related to the sampling or on-going site investigation, please visit our website at www.epaossc.org/southdaytonedumpsite or contact me at 513-569-7539.

Sincerely,



Steven L. Renninger
On-Scene Coordinator
U.S. EPA Region 5

Attachments:

- A -- Sample Location Map
- B -- Validated Analytical Results

cc: Leslie Patterson - U.S. EPA Remedial Program Manager
Laura Marshall - Ohio EPA, Site Coordinator
Adam Loney, CRA
Tina Ortiz - Mark Fornes Realty, Inc.
Site File

ATTACHMENT A
SAMPLE LOCATION MAP



